

Message

From: [REDACTED] Ex. 6 Personal Privacy (PP)
Sent: 1/14/2021 5:49:50 PM
To: 'Hodson Marten, Elke L. EOP/OM' [REDACTED] Ex. 6 Personal Privacy (PP)
CC: [REDACTED] Ex. 6 Personal Privacy (PP) [REDACTED] Ex. 6 Personal Privacy (PP) in [REDACTED] Ex. 6 Personal Privacy (PP)
[REDACTED] Ex. 6 Personal Privacy (PP) [REDACTED] Ex. 6 Personal Privacy (PP)
[REDACTED] Ex. 6 Personal Privacy (PP) [REDACTED] Ex. 6 Personal Privacy (PP) [REDACTED] 6 Personal Privacy (PP)
Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Elke,

Thanks for additional time to comment on the PFBS evaluation. The initial short review period of 24 hours was a challenge for us to meet. We provide the following concerns for OMB and EPA consideration:

Ex. 5 Deliberative Process (DP)

Thank you so much for your insights and extra time for review,
Best regards,

[REDACTED] Ex. 6 Personal Privacy (PP)

INTERNAL DELIBERATIVE – DO NOT DISTRIBUTE

From: [REDACTED] Ex. 6 Personal Privacy (PP)
Sent: Wednesday, January 13, 2021 12:54 PM
To: [REDACTED] Ex. 6 Personal Privacy (PP)
Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

[REDACTED] Ex. 6 Personal Privacy (PP) responded to you earlier this morning, but my sent mailbox is not showing a reply from me to you.

What I was saying is that yes [REDACTED] Ex. 5 Deliberative Process (DP)

[REDACTED] Ex. 5 Deliberative Process (DP)

[REDACTED] We're still in the middle of the EO12866 process.

If DOD wants to send additional comments, we can pass them on. Also happy to hop on the phone if you'd like.

[REDACTED] Ex. 6 Personal Privacy (PP)

From: [Ex. 6 Personal Privacy (PP)]
Sent: Wednesday, January 13, 2021 10:14 AM
To: Hodson Marten, Elke L. EOP/OMB [Ex. 6 Personal Privacy (PP)]
Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Elke,
I wanted to bring the article below to your attention:

"CHEMICAL REACTION: EPA political officials overruled the agency's career scientists to weaken a major health assessment for the chemical PFBS — one type of PFAS "forever chemicals," four sources with knowledge of the changes tell Pro's Annie Snider . A replacement for PFOS, which was phased out in the mid-2000s over health concerns, PFBS has been used for years in military firefighting foam, carpeting and food packaging, and is contaminating the drinking water of an estimated 860,000 Americans.

The changes open the door for state and federal regulators to potentially set less stringent cleanup standards and drinking water limits. The assessment has been in the works for more than three years, Annie reports, and has been a particular concern for the Defense Department, which faces massive cleanup liability. The draft assessment EPA released for public comment in November 2018 took the standard approach of providing a single number describing how toxic the chemical is to humans, called a "reference dose." But the final assessment sent to the White House for review Monday replaces that with a range of values, the sources said, a change made by staffers in the agency's pesticides office at the direction of political officials — not the career scientists at EPA who specialize in assessing the human health risks of chemicals. The alterations were so alarming that several of the career EPA scientists who spent years working on the study have asked that their names be removed from the document, two of the sources said. Environmental advocates say the range approach would allow industry and state and local officials to "cherry-pick" the number they like best. Two of the sources told Annie the new range of references doses include slightly weaker values than EPA forward put forward in November, but said the most alarming part isn't the numbers themselves, since the conclusion is still that PFBS is dangerous at very low levels of exposure. Rather, it's the fact that political officials upended the scientific process to arrive at them. "It's not orders of magnitudes, but that's irrelevant. How much does it matter if you get one drop or two drops of cyanide?" said the source, a senior EPA scientist. At the same time, the Trump administration moved to inject greater White House influence over future such chemical assessments, issuing a memo from OMB on Friday that requires all health assessments from EPA's premiere risk assessors to go through interagency review. The move effectively reinstates a process that was in place under the George W. Bush administration, which a government watchdog found "limits the credibility" of assessments from the Integrated Risk Information System, which has for years been a top target for the chemicals industry, Republicans on Capitol Hill and Trump's EPA research chief, David Dunlap."

Ex. 5 Deliberative Process (DP)

V/r,
Tricia

Ex. 6 Personal Privacy (PP)

Deputy for Chemical and Material Risk Management
Office of the Assistant Secretary of Defense (S)
4800 Mark Center Drive
Box#56, Suite 16F16
Alexandria, VA 22350

Ex. 6 Personal Privacy (PP)

INTERNAL DELIBERATIVE – DO NOT DISTRIBUTE

From: Ex. 6 Personal Privacy (PP)

Sent: Tuesday, January 12, 2021 12:03 PM

To: 'Hodson Marten, Elke L. EOP/OMB' <Ex. 6 Personal Privacy (PP)> Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP)

Cc: Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP) Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Elke,
We do not have any additional comments.

Thank you,

Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Deputy for Chemical and Material Risk Management
Office of the Assistant Secretary of Defense (S)
4800 Mark Center Drive
Box#56, Suite 16F16
Alexandria, VA 22350

Ex. 6 Personal Privacy (PP)

From: Hodson Marten, Elke L. EOP/OMB <Elke.L.HodsonMarten@omb.eop.gov>

Sent: Tuesday, January 12, 2021 11:02 AM

To: Ex. 6 Personal Privacy (PP)

Ex. 6 Personal Privacy (PP)

Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Thank Ex. 6 Personal Privacy (PP)

+ DOD reg review mailbox for coordination.

Does DOD expect to have any additional comments?

From: Ex. 6 Personal Privacy (PP)

Sent: Tuesday, January 12, 2021 10:43 AM

To: Hodson Marten, Elke L. EOP/OMB Ex. 6 Personal Privacy (PP)

Cc: **Ex. 6 Personal Privacy (PP)**

Subject: RE: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Elke,

My comments on EPA's "Human Health Toxicity Values for Perfluorobutane Sulfonic Acid (CASRN 375-73-5) and Related Compound Potassium Perfluorobutane Sulfonate (CASRN 29420-49-3)" follow:

COMMENTS:

- **Ex. 5 Deliberative Process (DP)**

- **Ex. 5 Deliberative Process (DP)**

Respectfully submitted.

--

V/R

Ex. 6 Personal Privacy (PP)

Toxicologist and Risk Assessor

Environmental Program Department

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From: Hodson Marten, Elke L. EOP/OMB <[REDACTED] Ex. 6 Personal Privacy (PP)>
Sent: Monday, January 11, 2021 5:14 PM
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[REDACTED] Ex. 6 Personal Privacy (PP)> [REDACTED] Ex. 6 Personal Privacy (PP)>
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Leggett, Carmine S. EOP/OMB <[REDACTED] Ex. 6 Personal Privacy (PP)> Kymn, Christine J. EOP/OMB
[REDACTED] Ex. 6 Personal Privacy (PP)> Schwab, Margo EOP/OMB <[REDACTED] Ex. 6 Personal Privacy (PP)>
Subject: For EO 12866 Review: *EPA's PFBS Evaluation* Comments due tomorrow 1/12

Colleagues,

Attached for your review is EPA's "Human Health Toxicity Values for Perfluorobutane Sulfonic Acid (CASRN 375-73-5) and Related Compound Potassium Perfluorobutane Sulfonate (CASRN 29420-49-3)".

Ex. 5 Deliberative Process (DP)

Regulatory Distribution (Cc): The OIRA Administrator has made a determination that this document, which was [REDACTED] Ex. 5 Deliberative Process (DP)> is significant guidance and needs to follow the EO 12866 review process. Although it is in the final stages of review, this document is being transitioned to the standard EO 12866 review process.

Summary: EPA is issuing draft subchronic and chronic oral toxicity values for perfluorobutane sulfonic acid (PFBS) and its related salt, potassium perfluorobutane sulfonate (K⁺PFBS). The toxicity assessment provides qualitative and quantitative toxicity information that can be used along with exposure information and other considerations to assess potential health risks to determine if, and when, it is appropriate to take action to address these chemicals. In addition to including toxicity values associated with potential noncancer health effects following oral exposure, the assessment also evaluates human health hazards.

As a reminder, the attached materials are deliberative and pre-decisional while under OMB review and may not be shared or discussed with anyone outside of the Executive Branch. Please help us maintain the integrity of the interagency review process by respecting these process requirements.

Best, Elke